

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WAYNE BALIGA, derivatively on behalf of  
LINK MOTION INC. (F/K/A NQ MOBILE INC.)

Plaintiff,

-against-

LINK MOTION INC. (F/K/A NQ MOBILE  
INC.), VINCENT WENYONG SHI, JIA LIAN,  
XIAO YU,

Defendants,

-and-

LINK MOTION INC. (F/K/A NQ MOBILE  
INC.),

Nominal Defendant.

Civil Action No.: 1:18-cv-11642

**NOTICE OF MOTION FOR RELIEF  
FROM ORDER DENYING IN PART  
MOTION TO UNSEAL RECORDS**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law filed herewith, the citations to the record therein, the accompanying declaration of Michael James Maloney, dated September 28, 2022, and upon all prior proceedings and filings in this action, Defendants Vincent Wenyong Shi (“Dr. Shi”) and Link Motion Inc. f/k/a NQ Mobile Inc. (the “Company”), by their undersigned counsel, will move this Court, located at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, before the Honorable Valerie Figueredo, United States District Judge, at a date and time to be determined by the Court, for an Order granting the following relief:

(1) Relief, pursuant to Rule 60(b)(1), (2), and (6), from that part of the Order dated August 22, 2022 (Dkt. No. 329), which denied the motion by Dr. Shi to unseal “Category 3 Documents” (as defined in Dkt. No. 329) concerning a note agreement between Robert W. Seiden, the court-appointed receiver (the “Receiver”), and Lilin “Francis” Guo (“Guo”); and

(2) Ordering that the Category 3 Documents be immediately unsealed and produced to Dr. Shi and the Company; and

(3) granting such other and further relief as the Court deems just and proper;

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.3, the time periods for service of answering and reply memoranda, if any, shall be governed by Local Civil Rule 6.1(a) or (b).

Dated: New York, New York  
September 28, 2022

Respectfully submitted,  
  
FELICELLO LAW P.C.

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Shi*